

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

Newell Rubbermaid, Inc.	:	Civil Action No. 5:08-CV-02632-SL
Plaintiff,	:	JUDGE SARA LIOI
vs.	:	MOTION TO QUASH
	:	SUBPOENA AND FOR
The Raymond Corporation, et al	:	PROTECTIVE ORDER
Defendant.	:	

Critchfield, Critchfield and Johnston, Ltd. (“CCJ”) moves this Court to quash the subpoena served on CCJ by counsel for Defendants and to issue a protective order. The challenged subpoena requests “All documents of any type whatsoever regarding the civil suit of Jean Hashman v. Newell Rubbermaid, Inc. *et al.* in the Court of Common Pleas for the County of Stark, Ohio, Case Number 2006 CV 04984.” CCJ previously represented the Plaintiff in this substantially related litigation, and CCJ continues to represent Plaintiff in unrelated matters.

The subpoena provided less than one week for compliance. The subpoena should be quashed and a protective order issued because: the subpoena requires disclosure of privileged or

otherwise protected matter and no exception or waiver applies; and the subpoena failed to allow a reasonable time to comply.

Respectfully Submitted,

CRITCHFIELD, CRITCHFIELD & JOHNSTON, LTD.

By: /s/ Susan E. Baker
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CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2009, a copy of the foregoing *Motion to Quash Subpoena and for Protective Order* was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Susan E. Baker
Susan E. Baker